

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
UNITED STATES OF AMERICA : **PROTECTIVE ORDER**
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- v. - :
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JESUS MANUEL RIOS QUINTERO, :
and :
ALBERTO MORETA, :
:
Defendants. :
:
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Upon the application of the United States of America,
Geoffrey S. Berman, United States Attorney for the Southern
District of New York, by and through Ryan Finkel, Sarah Mortazavi,
and Joshua A. Naftalis, Assistant United States Attorneys, of
counsel, for an order precluding the dissemination of material
produced pursuant to 18 U.S.C. § 3500 and/or *Giglio v. United
States*, 405 U.S. 150 (1972) ("3500 Material") or otherwise
confidential material ("Confidential Material," and with 3500
Material "Protected Material")¹, and based on the Court's
independent review,

¹ 3500 Material shall be marked with a Bates stamp designation of
"3500" or otherwise identified as such by the Government.
Confidential Material shall be marked with a Bates stamp
designation of "Confidential" or otherwise identified as such by
the Government.

IT IS HEREBY ORDERED that (1) defense counsel must destroy or return to the Government all Protected Material (and any copies thereof) at the conclusion of the trial of this matter or when any appeal has become final; (2) the defense and the defendants are precluded from disseminating any of the Protected Material to anyone beyond the defendants, defense counsel, and any paralegal or staff employed by the defense; and (3) the defendants are precluded from taking or keeping any copies of the Protected Material (except for 3500 Material produced for law enforcement agents) whether before, during, or after trial; except that the defendants may review copies of the Protected Material in the possession of defense counsel or any paralegal or staff employed by the defense, when in the presence of defense counsel or any paralegal or staff employed by the defense.

IT IS FURTHER ORDERED that the defendants, defense counsel, and any paralegal or staff employed by the defense are precluded from publicly disclosing or disseminating the identity

of any non-law enforcement witnesses until March 16, 2020.

Dated: New York, New York
February 24, 2020



THE HONORABLE NAOMI RICE BUCHWALD
UNITED STATES DISTRICT JUDGE